

# Exhibit U



Deposition of:  
**William Longo , Ph.D.**

*February 27, 2020*

In the Matter of:  
**Zimmerman, Linda Vs. Autozone Inc.,  
Et Al.**

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1 A No.

2 Q Do you know when your deposition in  
3 Citizen is resuming? Have you given them a date  
4 for that yet?

5 A You know, I may have.

6 Q You just don't recall right now?

7 A No. I'd have to check with my office.  
8 But I'm sure that's been set.

9 Q I'm turning my attention to Exhibit 6,  
10 which was the -- I'm hoping is the February 4th,  
11 2020, slides that you had prepared for the  
12 meeting with some of the representatives from the  
13 FDA.

14 A Yes.

15 Q Do you have that there?

16 A I do.

17 Q There's a slide -- they're not  
18 numbered -- about halfway through. The title of  
19 it is MAS LLC HLS Analysis for Chrysotile  
20 Asbestos by PLM.

21 A Yes.

22 Q On this particular page, what's being  
23 shown on this slide again titled MAS HLS Analysis  
24 for Chrysotile Asbestos by PLM, is this the  
25 method that was used with respect to the

1 chrysotile analysis by PLM on the two bottles  
2 that had been submitted by Ms. Zimmerman to her  
3 counsel?

4 A Very close. Since February 4th, we've  
5 refined it a little. For PLM bulk, we're  
6 starting with one gram, and we're using what  
7 Reynolds used in his 1974 protocol that he wrote  
8 for the Colorado School of Mines.

9 And we are probably going to change  
10 that 2.72 which was used for Zimmerman's to 2.65.  
11 I believe that's more efficient for chrysotile.  
12 And the centrifuge at 5 minutes for 500 RPM and  
13 1800 RPM, we found that 10 minutes works better  
14 on efficiency of separation, so that's changed.  
15 Everything else is the same.

16 Q So I think the first thing you said  
17 was something about one gram. Where's the change  
18 at least with respect to that particular  
19 component in the slide?

20 A See the very first sentence that says,  
21 "Stain 200 milligrams of cosmetic talc with  
22 Betadine (2 percent iodine)"?

23 Q Yes.

24 A That's been changed to one gram.

25 Q And what was the reasoning for that

CERTIFICATE

STATE OF GEORGIA:

COUNTY OF COBB:

I hereby certify that the foregoing transcript was taken down, as stated in the caption, and the colloquies, questions and answers were reduced to typewriting under my direction; that the transcript is a true and correct record of the evidence given upon said proceeding.

I further certify that I am not a relative or employee or attorney of any party, nor am I financially interested in the outcome of this action.

I have no relationship of interest in this matter which would disqualify me from maintaining my obligation of impartiality in compliance with the Code of Professional Ethics.

I have no direct contract with any party in this action and my compensation is based solely on the terms of my subcontractor agreement.

Nothing in the arrangements made for this proceeding impacts my absolute commitment to serve all parties as an impartial officer of the

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1 court.

2 This the 2nd day of March, 2020.

3  
4 Jennifer D. Hamon

5  
6 Jennifer D. Hamon, CCR B-2287, RPR